

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

JOHN E. JAUNICH, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

STATE FARM LIFE INSURANCE
COMPANY,

Defendant.

Case No. 20-1567 (PAM/BRT)

**DECLARATION OF NORMAN E.
SIEGEL IN SUPPORT OF
PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION**

I, Norman E. Siegel, declare:

1. I am a founder and partner at the law firm of Stueve Siegel Hanson LLP, counsel of record for Plaintiff and the putative class in the above-captioned matter. I am admitted *pro hac vice* to appear and participate in this case. I make this declaration of my own personal knowledge. If called to testify, I could and would competently testify to the following:

2. I have been a member of the Missouri bar since 1993 when I obtained my J.D. from Washington University School of Law in St. Louis, Missouri where I served as an Editor of the *Journal of Urban Contemporary Law*. Prior to starting Stueve Siegel Hanson in 2001, I served as an Assistant Attorney General for the state of Missouri and as a partner of the law firm currently named Dentons.

3. Over 25 years of practice I have been recognized by my peers as one of the top commercial trial lawyers in the country and have recently prosecuted complex business cases including class actions against some the largest businesses in the world

including Capital One, Equifax, Experian, Union Pacific Railroad, Kinder Morgan, Intuit, Home Depot, Target, U.S. Bank, John Hancock, and H&R Block. I have served as trial, class, and appellate counsel in a wide variety of complex commercial cases, representing both plaintiffs and defendants.

4. I was recently named by *The Best Lawyers in America*® as a “Lawyer of the Year” for class action litigation and have been named by *Best Lawyers* as a Tier 1 practitioner in three practice areas including commercial litigation and class actions. I have been elected a Missouri & Kansas Super Lawyer (Top 100 List), and have been named “Best of the Bar” and a “Kansas City Newsmaker” by the Kansas City Business Journal. I was also named by Law360 as one of ten “Titans of the Plaintiffs’ Bar,” to Lawdragon Magazine’s 500 Leading Plaintiffs’ Lawyers in America, and named a “Local Litigation Star” by *Benchmark Plaintiffs*. I am rated AV—the highest designation a lawyer can achieve from publisher Martindale-Hubbell.

5. Stueve Siegel Hanson has 26 lawyers and 10 staff members located in Kansas City, Missouri. The firm has sufficient financial and personnel resources to litigate this case to final judgment. Moreover, the firm, along with Miller Schirger, has successfully litigated cases of the type at issue here, including trying a case against State Farm Life Insurance Company, the defendant here, resulting in a jury verdict of over \$34 million on behalf of the class of approximately 24,000 policyholders for the same claims at issue in this case. *See Vogt v. State Farm Life Ins. Co.*, Case No. 2:16-cv-04170-NKL, Dkt. 358 (W.D. Mo. June 6, 2018), *aff’d* 963 F.3d 753 (8th Cir. 2020), *cert. denied*, --- S.Ct. ----, 2021 WL 1521013 (U.S. Apr. 19, 2021). The *Vogt* matter remains under appeal as to a

limited issue regarding pre-judgment interest. The firm (together with Miller Schirger) is also simultaneously prosecuting six additional cases against State Farm making the similar claims as those here in federal district courts in California, Minnesota, Florida, Arizona, Oregon, and Texas, as well as similar cases against USAA Life Insurance Company, Connecticut General Life Insurance Company, and Kansas City Life Insurance Company. Additionally, Stueve Siegel Hanson with Miller Schirger has secured settlements on behalf of 77,000 policyholders against Lincoln National Life Insurance Company providing additional death benefits valued at \$2.25 billion, with a market value of approximately \$171.8 million (*see Bezich v. The Lincoln Nat. Life Ins. Co.*, No 02C01-0906-PL-73 (Allen Co., Ind.)), and nearly \$60 million on behalf of approximately 90,000 John Hancock Life Insurance Company policyholders (*Larson v. John Hancock Life Ins. Co.*, No. RG16813803 (Alameda Co., Cal.)). Likewise, Stueve Siegel Hanson and Miller Schirger have secured \$90 million settlement on behalf of 120,000 policyholders against USAA Life Insurance Company, which is currently in the notice process and set for a fairness hearing in August 2021. *See Spegele v. USAA Life Ins. Co.*, No. 5:17-cv-967-OLG (W.D. Tex.).

6. I have been appointed class counsel and represented clients in dozens of class actions in state and federal courts across the country. My firm has substantial experience handling large, complex class litigation, including not just settling such cases but also trying the cases to final judgment. Examples of my firm's experience, along with the brief résumés of the attorneys at Stueve Siegel Hanson working on this case, are included in the firm résumé of Stueve Siegel Hanson LLP, attached hereto as Exhibit A.

7. As the representative cases contained in Stueve Siegel Hanson LLP's firm résumé demonstrate, I and my firm have an extensive history of achieving significant monetary relief for class members. We are prepared to litigate this case to trial, if necessary. We are prepared to invest all resources necessary to fully and adequately prosecute this case and advance the interests of the class members.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 16th day of June, 2021 in Kansas City, Missouri.

/s/ Norman E. Siegel

Norman E. Siegel